


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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

1. Alejandro Rodriguez, and
(Count 1)

2. Maricruz Carrillo,
(Count 2)

Defendants.

No. CR-25-00540-PHX-SHD (DMF)

INDICTMENT

VIO: 18 U.S.C. §§ 922(g)(1) and
924(a)(8)
(Felon in Possession of a Firearm)
Counts 1-2

18 U.S.C. § 924(d),
21 U.S.C. § 853, and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

On or about March 15, 2025, in the District of Arizona, Defendant, ALEJANDRO RODRIGUEZ, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess the following firearms and ammunition:

(1) Norinco, model 56S-1, 7.62x39 mm caliber semi-automatic rifle, serial number MS009197;

(2) Colt, model Combat Elite Commander, .45 ACP caliber semi-automatic pistol,

1 serial number XE06391;

2 (3) FN Herstal, model SCAR-15P, 5.56x45 mm caliber semi-automatic pistol, serial
3 number SCP02486;

4 (4) Colt, model Government, .38 Super Auto semi-automatic pistol, serial number
5 GV068782;

6 (5) Staccato, model C2, 9x19 mm caliber semi-automatic pistol, serial number
7 TX27669;

8 (6) Palmetto State Armory, model AKV, 9x19 mm caliber semi-automatic pistol,
9 serial number AKV011440;

10 (7) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
11 rifle, serial number SV7158948;

12 (8) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
13 rifle, serial number SV7159522;

14 (9) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
15 rifle, serial number SV7158867;

16 (10) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
17 automatic rifle, serial number SV7159432;

18 (11) FN USA, model M249S, 5.56x45 mm caliber semi-automatic rifle, serial
19 number M249SA10935;

20 (12) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
21 automatic rifle, serial number SV7159412;

22 (13) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
23 automatic rifle, serial number SV7159419;

24 (14) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
25 automatic rifle, serial number SV7159024;

26 (15) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
27 automatic rifle, serial number SV7159060;

28 (16) Century Arms International, model VSKA, 7.62x39 mm caliber semi-

1 automatic rifle, serial number SV7159506;

2 (17) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
3 automatic rifle, serial number SV7159401;

4 (18) Norinco, model MAK90, 7.62x39 mm caliber semi-automatic rifle, serial
5 number 9438246;

6 (19) Barrett, model M82A1, .50 BMG caliber semi-automatic rifle, serial number
7 AA009973;

8 (20) Colt, model Government, .38 Super Auto 5 caliber semi-automatic pistol, serial
9 number GV068788;

10 (21) Colt, model Government, .38 Super Auto caliber semi-automatic pistol, serial
11 number GV050725;

12 (22) about 1,000 rounds of ammunition manufactured by PMB;

13 (23) about 16,000 rounds of ammunition manufactured by Tela Ammo; and

14 (24) about 40,000 rounds of ammunition manufactured by KCN3;

15 said firearm(s) and ammunition having been shipped and transported in interstate or foreign
16 commerce.

17 In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

18 **COUNT 2**

19 On or about March 15, 2025, in the District of Arizona, Defendant, MARICRUZ
20 CARRILLO, knowing that she had been convicted of a crime punishable by a term of
21 imprisonment exceeding one year, did knowingly possess the following firearms and
22 ammunition:

23 (1) Norinco, model 56S-1, 7.62x39 mm caliber semi-automatic rifle, serial number
24 MS009197;

25 (2) Colt, model Combat Elite Commander, .45 ACP caliber semi-automatic pistol,
26 serial number XE06391;

27 (3) FN Herstal, model SCAR-15P, 5.56x45 mm caliber semi-automatic pistol, serial
28 number SCP02486;

1 (4) Colt, model Government, .38 Super Auto semi-automatic pistol, serial number
2 GV068782;

3 (5) Staccato, model C2, 9x19 mm caliber semi-automatic pistol, serial number
4 TX27669;

5 (6) Palmetto State Armory, model AKV, 9x19 mm caliber semi-automatic pistol,
6 serial number AKV011440;

7 (7) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
8 rifle, serial number SV7158948;

9 (8) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
10 rifle, serial number SV7159522;

11 (9) Century Arms International, model VSKA, 7.62x39 mm caliber semi-automatic
12 rifle, serial number SV7158867;

13 (10) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
14 automatic rifle, serial number SV7159432;

15 (11) FN USA, model M249S, 5.56x45 mm caliber semi-automatic rifle, serial
16 number M249SA10935;

17 (12) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
18 automatic rifle, serial number SV7159412;

19 (13) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
20 automatic rifle, serial number SV7159419;

21 (14) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
22 automatic rifle, serial number SV7159024;

23 (15) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
24 automatic rifle, serial number SV7159060;

25 (16) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
26 automatic rifle, serial number SV7159506;

27 (17) Century Arms International, model VSKA, 7.62x39 mm caliber semi-
28 automatic rifle, serial number SV7159401;

1 (18) Norinco, model MAK90, 7.62x39 mm caliber semi-automatic rifle, serial
2 number 9438246;

3 (19) Barrett, model M82A1, .50 BMG caliber semi-automatic rifle, serial number
4 AA009973;

5 (20) Colt, model Government, .38 Super Auto 5 caliber semi-automatic pistol, serial
6 number GV068788;

7 (21) Colt, model Government, .38 Super Auto caliber semi-automatic pistol, serial
8 number GV050725;

9 (22) about 1,000 rounds of ammunition manufactured by PMB;

10 (23) about 16,000 rounds of ammunition manufactured by Tela Ammo; and

11 (24) about 40,000 rounds of ammunition manufactured by KCN3;

12 said firearm(s) and ammunition having been shipped and transported in interstate or foreign
13 commerce.

14 In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

15 **FORFEITURE ALLEGATION**

16 The Grand Jury realleges and incorporates the allegations of Counts 1 through 2 of
17 this Indictment, which are incorporated by reference as though fully set forth herein.

18 Pursuant to Title 18, United States Code, Section 924(d), Title 21, United States
19 Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction
20 of the offense alleged in Counts 1 through 2 of this Indictment, the defendants shall forfeit
21 to the United States of America all right, title, and interest in (a) any property constituting,
22 or derived from, any proceeds the persons obtained, directly or indirectly, as the result of
23 the offense, and (b) any property used, or intended to be used, in any manner or part, to
24 commit, or to facilitate the commission of such offense.

25 If any of the above-described forfeitable property, as a result of any act or omission
26 of the defendants:

27 (1) cannot be located upon the exercise of due diligence,

28 (2) has been transferred or sold to, or deposited with, a third party,

1 (3) has been placed beyond the jurisdiction of the court,
2 (4) has been substantially diminished in value, or
3 (5) has been commingled with other property which cannot be divided without
4 difficulty,
5 it is the intent of the United States to seek forfeiture of any other property of said
6 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
7 21, United States Code, Section 853(p).

8 All in accordance with Title 18, United States Code, Section 924(d), Title 21, United
9 States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule 32.2,
10 Federal Rules of Criminal Procedure.

11

A TRUE BILL

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s/
FOREPERSON OF THE GRAND JURY
Date: April 8, 2025

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TIMOTHY COURCHINE
United States Attorney
District of Arizona

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s/
MARIA R. GUTIERREZ
Assistant U.S. Attorney

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